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RCRV, Inc. d/b/a Rock Revival

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **WESTERN DIVISION**

12 RCRV, INC. d/b/a ROCK REVIVAL, )  
13 a California corporation, )

14 Plaintiff, )

15 v. )  
16

17 EXPRESS, INC., a Delaware )  
corporation, SUNRISE BRANDS, )  
18 LLC, a California limited liability )  
company, REROCK LLC, a California )  
19 limited liability company, and )  
20 GUANGZHOU NANDADI TEXTILE )  
GARMENT CO., LTD., a Chinese )  
21 limited liability company, )

22 Defendants. )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

Case No.: 2:13-cv-07534

**COMPLAINT FOR:**

- (1) Trademark Infringement in Violation of 15 U.S.C. § 1114;  
(2) False Designation of Origin in Violation of 15 U.S.C. § 1125(a);  
(3) Common Law Trademark Infringement and Unfair Competition;  
(4) Unfair Competition in Violation of California Bus. & Prof. Code §§ 17200 *et seq.*;

1 Plaintiff RCRV, Inc. d/b/a Rock Revival (“RCRV”), by and through its  
2 undersigned counsel, complains of defendants Express, Inc. (“Express”), Sunrise  
3 Brands, LLC (“Sunrise”), Rerock, LLC (“Rerock”), and Guangzhou Nandadi Textile  
4 Garment Co., Ltd. (“Guangzhou Nandadi”) (collectively “Defendants”), and alleges  
5 as follows:

### 6 **JURISDICTION AND VENUE**

7 1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§  
8 1331 and 1338, and 15 U.S.C. § 1121. Plaintiff’s claims are predicated upon the  
9 Trademark Act of 1946, as amended, 15 U.S.C. § 1051 *et seq.*, and substantial and  
10 related claims under the statutory and common law of the State of California.

11 2. Venue is properly founded in this judicial district pursuant to 28 U.S.C.  
12 §§ 1391(b) and (c), because Defendants are either subject to personal jurisdiction  
13 within this judicial district, and/or because a substantial part of the events giving rise  
14 to Plaintiff’s claims occurred within this judicial district.

### 15 **NATURE OF THE ACTION**

16 3. Plaintiff seeks injunctive relief and damages for acts of trademark  
17 counterfeiting and infringement, false designation of origin, and unfair competition,  
18 engaged in by Defendants in violation of the laws of the United States and the State  
19 of California.

20 4. In particular, this case concerns Defendants’ willful, deliberate and  
21 systematic targeting of RCRV, and its infringement of RCRV’s distinctive  
22 INVERTED FLEUR-DE-LIS DESIGN trademark used on and in connection with its  
23 highly successful line of ROCK REVIVAL brand jeanswear products. After  
24 substantial resources had been expended by RCRV promoting and selling jeanswear  
25 products featuring its INVERTED FLEUR-DE-LIS DESIGN, and after consumers  
26 had come to recognize such design and associate it exclusively with RCRV,  
27 Defendants created and introduced jeanswear products with virtually identical  
28 designs. This conduct was undertaken in bad faith, was without RCRV’s consent,

1 and was engaged in by Defendants with full knowledge of RCRV's rights in its  
2 distinctive INVERTED FLEUR-DE-LIS DESIGN trademark, and deliberately so that  
3 they could compete directly with RCRV and siphon off sales from RCRV's popular  
4 ROCK REVIVAL jeanswear line.

### 5 **THE PARTIES**

6 5. Plaintiff RCRV is a corporation duly organized and existing under the  
7 laws of the State of California, with its principal place of business at 4715 South  
8 Alameda Street, Los Angeles, California 90058.

9 6. Upon information and belief, Defendant Express is a corporation duly  
10 organized and existing under the laws of the State of Delaware, with its principal  
11 place of business located at 1 Express Drive, Columbus, Ohio 43230.

12 7. Upon information and belief, Defendant Sunrise is a limited liability  
13 company duly organized and existing under the laws of the State of California, with  
14 its principal place of business located at 801 South Figueroa Street, Suite 2500, Los  
15 Angeles, California 90017.

16 8. Upon information and belief, Defendant Rerock is a limited liability  
17 company duly organized and existing under the laws of the State of California, with  
18 its principal place of business located at 801 South Figueroa Street, Suite 2500, Los  
19 Angeles, California 90017.

20 9. Upon information and belief, Defendant Guangzhou Nandadi is a limited  
21 liability company duly organized and existing under the laws of the People's  
22 Republic of China, with its principal place of business located at Shapu Industrial  
23 Development Zone, Zengcheng, Guangzhou 511338, the People's Republic of China.

### 24 **RCRV'S BUSINESS**

25 10. RCRV manufactures, promotes, sells and distributes high-quality  
26 jeanswear and denim products throughout the United States, including in this judicial  
27 district, under the ROCK REVIVAL brand name.

1           11.     ROCK REVIVAL brand jeanswear is sold at retail by such well-known  
2 fashion chain stores and department stores as The Buckle and Nordstrom, both in-  
3 store and online. ROCK REVIVAL brand jeanswear and denim products have  
4 become very popular in the highly competitive jeanswear market. Among the many  
5 elements that distinguish ROCK REVIVAL jeanswear from its competitors are a  
6 series of design elements embroidered onto the jeans that are used exclusively on  
7 ROCK REVIVAL jeanswear, and which have come to identify RCRV as the source  
8 of such products.

9                     **RCRV'S INVERTED FLEUR-DE-LIS DESIGN MARK**

10           12.     In March 2006, RCRV's predecessor introduced a distinctive Inverted  
11 Fleur-de-lis Design embroidered onto the rear pocket of its jeans (the "INVERTED  
12 FLEUR-DE-LIS DESIGN Trademark"), a new and unique design that was unlike  
13 anything used before in the jeanswear industry. Given its innovative design  
14 characteristics, the INVERTED FLEUR-DE-LIS DESIGN is an inherently distinctive  
15 identifier that became immediately associated with ROCK REVIVAL brand  
16 jeanswear products. Further, RCRV and its predecessor have continuously and  
17 exclusively used the INVERTED FLEUR-DE-LIS DESIGN on jeanswear products  
18 since March 2006, to the point where the INVERTED FLEUR-DE-LIS DESIGN has  
19 become the signature design of RCRV's business.

20           13.     The INVERTED FLEUR-DE-LIS DESIGN Trademark is the subject of  
21 U.S. Trademark Registration No. 4,248,371, registered on November 27, 2012 on the  
22 Principal Register for jeans. RCRV's trademark registration for the INVERTED  
23 FLEUR-DE-LIS DESIGN Trademark is in full force and effect. A copy of the  
24 registration certificate for the INVERTED FLEUR-DE-LIS DESIGN Trademark  
25 along with a photograph of the INVERTED FLEUR-DE-LIS DESIGN as used by  
26 RCRV on its ROCK REVIVAL line of jeanswear products is attached hereto as  
27 Exhibit A.  
28

1           14. RCRV products bearing the INVERTED FLEUR-DE-LIS DESIGN are  
2 distributed and sold in over 900 stores worldwide, including retailers such as  
3 Nordstrom and The Buckle. In addition, products bearing the INVERTED FLEUR-  
4 DE-LIS DESIGN are featured on-line at RCRV's ROCK REVIVAL brand official  
5 website, <www.rockrevival.com>, and are sold on various websites affiliated with  
6 RCRV's authorized retail department stores.

7           15. In the United States, sales of RCRV's products featuring the  
8 INVERTED FLEUR-DE-LIS DESIGN have been rapidly increasing over the past  
9 few years. For example, sales of products bearing the INVERTED FLEUR-DE-LIS  
10 DESIGN exceeded \$4 million in 2008, \$20 million in 2009, \$30 million in 2010, \$50  
11 million in 2011, and \$60 million in 2012.

12           16. Moreover, RCRV and its predecessor have consistently promoted the  
13 INVERTED FLEUR-DE-LIS DESIGN as an indicator of source for ROCK  
14 REVIVAL jeans, and RCRV has expended substantial amounts of money promoting  
15 the INVERTED FLEUR-DE-LIS DESIGN as an indicator of source for its goods. In  
16 particular, over the last five plus years, the INVERTED FLEUR-DE-LIS DESIGN  
17 has enjoyed coverage in leading mainstream and fashion publications in the United  
18 States. For example, the leading fashion industry publication *Women's Wear Daily*  
19 listed ROCK REVIVAL as the tenth-most searched-for denim brand in its April 2009  
20 edition and in its November 2009 edition focusing on jeanswear rear pocket designs.

21           17. The INVERTED FLEUR-DE-LIS DESIGN is featured on the rear  
22 pocket of nearly all RCRV jeanswear products and RCRV's retail customers  
23 consistently recognize the INVERTED FLEUR-DE-LIS DESIGN as RCRV's  
24 "signature" and/or "trademark."

25           18. Further, celebrities have repeatedly been seen wearing RCRV jeanswear  
26 bearing the INVERTED FLEUR-DE-LIS DESIGN, creating millions of commercial  
27 "impressions" of the design, including Steven Tyler, lead singer of the famous rock  
28 band Aerosmith, in *Rolling Stone* magazine; the Oscar winning actress, Halle Berry,

1 in *US Weekly*; Teri Hatcher on the popular television show *Desperate Housewives*;  
2 and former National Football League star, and *Dancing With The Stars* winner, Hines  
3 Ward.

4 19. Accordingly, in addition to being, in and of itself, inherently distinctive,  
5 the INVERTED FLEUR-DE-LIS DESIGN Trademark has, through extensive sales,  
6 promotion and media coverage of ROCK REVIVAL jeanswear, come to identify  
7 RCRV as the exclusive source of such products. As a result of RCRV's broad media  
8 exposure, and the uninterrupted and continuing promotion and sale of ROCK  
9 REVIVAL jeanswear bearing the INVERTED FLEUR-DE-LIS DESIGN Trademark,  
10 the design has acquired distinctiveness, and has developed a strong secondary  
11 meaning among consumers and the trade, immediately identifying RCRV as the  
12 exclusive source of products bearing the INVERTED FLEUR-DE-LIS DESIGN  
13 Trademark, and signifying goodwill of incalculable value.

#### 14 **DEFENDANTS' INFRINGING CONDUCT**

15 20. Upon information and belief, Defendants are currently, and at all times  
16 relevant hereto have been, engaged in the business of designing, manufacturing,  
17 importing, exporting, distributing, supplying, advertising, promoting, offering for sale  
18 and selling jeanswear products.

19 21. Upon information and belief, Defendants are designing, manufacturing,  
20 importing, exporting, distributing, supplying, advertising, promoting, offering for sale  
21 and/or selling, and/or are causing to be designed, manufactured, imported, exported,  
22 distributed, supplied, advertised, promoted, offered for sale and/or sold, without  
23 authorization or license from RCRV, jeanswear products bearing designs that are  
24 confusingly similar to RCRV's INVERTED FLEUR-DE-LIS DESIGN Trademark  
25 (the "Infringing Designs").

26 22. Upon information and belief, Defendant Rerock is the owner of the  
27 REROCK brand, Defendant Sunrise is the licensee of the REROCK brand, and  
28 importer and distributor of products bearing the Infringing Designs, Defendant



Guangzhou Nandadi is the manufacturer of the Infringing Designs, and Defendant Express is the exclusive retailer of the Infringing Designs.

23. Photographs of the inverted fleur-de-lis designs used by Defendants on their REROCK line jeanswear products, which are confusingly similar to RCRV's INVERTED FLEUR-DE-LIS DESIGN Trademark, are attached hereto as Exhibit B. A photographic comparison of RCRV's INVERTED FLEUR-DE-LIS DESIGN and examples of certain of the Infringing Designs being used by Defendants is set forth below:

<u>RCRV's INVERTED FLEUR-DE-LIS DESIGN</u>	<u>Defendants' Inverted Fleur-De-Lis Designs</u>	
		
		
		

<b><u>RCRV's INVERTED FLEUR-DE-LIS DESIGN</u></b>	<b><u>Defendants' Inverted Fleur-De-Lis Designs</u></b>	
		
		

24. Upon information and belief, Defendants distribute, supply, advertise, promote, offer for sale and/or sell products bearing the Infringing Designs throughout the United States, including in this judicial district.

25. Rather than going to the effort and expense of developing and creating their own unique, source-identifying designs, Defendants have deliberately, knowingly and faithfully knocked off RCRV's INVERTED FLEUR-DE-LIS DESIGN Trademark. As a result, the jeanswear products bearing the Infringing Designs are likely to cause consumers, either at the point-of-sale or in the post-sale environment, to believe that products bearing the Infringing Designs are authorized, sponsored, approved, endorsed or licensed by RCRV, or are in some other way affiliated, associated, or connected with RCRV.

26. Upon information and belief, Defendants were aware that RCRV's INVERTED FLEUR-DE-LIS DESIGN Trademark was a well-known design of RCRV at the time they began using the Infringing Designs on their jeanswear products. Accordingly, upon information and belief, Defendants have been engaging in the above-described unlawful activities knowingly and intentionally, and/or with



1 reckless disregard for RCRV's rights in the INVERTED FLEUR-DE-LIS DESIGN  
2 Trademark.

3 27. Upon information and belief, Defendants intend to continue to design,  
4 manufacture, import, export, distribute, supply, advertise, promote, offer for sale  
5 and/or sell products bearing the Infringing Designs, unless otherwise restrained by  
6 this Court.

7 28. Unless Defendants' conduct is enjoined, such conduct will severely  
8 inhibit and/or destroy the ability of RCRV's INVERTED FLEUR-DE-LIS DESIGN  
9 Trademark to identify RCRV as the exclusive source of goods to which it is affixed.

10 **FIRST CLAIM FOR RELIEF**

11 **TRADEMARK INFRINGEMENT (15 U.S.C. § 1114)**

12 29. The allegations set forth in paragraphs 1 through 28 hereof are adopted  
13 and incorporated by reference as if fully set forth herein.

14 30. By the acts alleged herein, Defendants are using marks that are  
15 confusingly similar to RCRV's INVERTED FLEUR-DE-LIS DESIGN Trademark,  
16 and have infringed, and continue to infringe, the INVERTED FLEUR-DE-LIS  
17 DESIGN Trademark, in violation of 15 U.S.C. § 1114.

18 31. Upon information and belief, Defendants' use of marks that are  
19 confusingly similar to the INVERTED FLEUR-DE-LIS DESIGN Trademark has  
20 caused, is intended to cause, and is likely to continue to cause confusion, mistake and  
21 deception among the general consuming public and the trade as to the source of  
22 Defendants' products bearing such Infringing Designs, or as to a possible affiliation,  
23 connection or association between RCRV and Defendants' REROCK jeanswear line.

24 32. Upon information and belief, Defendants have acted with knowledge of  
25 RCRV's ownership of the INVERTED FLEUR-DE-LIS DESIGN Trademark, and  
26 with the deliberate intention to unfairly benefit from the goodwill symbolized  
27 thereby.

28 33. Defendants' acts constitute willful trademark infringement in violation

1 of 15 U.S.C. § 1114.

2 34. Upon information and belief, by their actions, Defendants intend to  
3 continue their unlawful conduct, and to willfully infringe RCRV's INVERTED  
4 FLEUR-DE-LIS DESIGN Trademark, unless restrained by this Court.

5 35. Upon information and belief, by their willful acts, Defendants have  
6 made and will continue to make substantial profits and gains to which they are not in  
7 law or equity entitled.

8 36. Defendants' acts have damaged and, unless enjoined, will continue to  
9 irreparably damage RCRV, and RCRV has no adequate remedy at law.

10 **SECOND CLAIM FOR RELIEF**

11 **FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))**

12 37. The allegations set forth in paragraphs 1 through 36 hereof are adopted  
13 and incorporated by reference as if fully set forth herein.

14 38. Upon information and belief, Defendants' use of marks that are  
15 confusingly similar to the INVERTED FLEUR-DE-LIS DESIGN Trademark has  
16 caused, is intended to cause, and is likely to continue to cause confusion, mistake and  
17 deception among the general consuming public and the trade as to the source of such  
18 products, or as to a possible affiliation, connection or association between RCRV and  
19 Defendants, and/or between RCRV and such products.

20 39. Defendants conduct as aforementioned constitutes a willful false  
21 designation of the origin of the products bearing the Infringing Designs, and/or false  
22 and misleading descriptions and representations of fact, all in violation of 15 U.S.C. §  
23 1125(a).

24 40. Upon information and belief, by their actions, Defendants intend to  
25 continue to falsely designate the origin of thier products as aforesaid, unless  
26 restrained by this Court.

27 41. Upon information and belief, by their willful acts, Defendants have  
28 made and will continue to make substantial profits and gains to which they are not in

1 law or equity entitled.

2 42. Defendants' acts have damaged and, unless enjoined, will continue to  
3 irreparably damage RCRV, and RCRV has no adequate remedy at law.

4 **THIRD CLAIM FOR RELIEF**

5 **COMMON LAW TRADEMARK INFRINGEMENT**

6 **AND UNFAIR COMPETITION**

7 43. The allegations set forth in paragraphs 1 through 42 hereof are adopted  
8 and incorporated by reference as if fully set forth herein.

9 44. By deliberately designing, manufacturing, importing, exporting,  
10 distributing, supplying, promoting, advertising, offering for sale and/or selling  
11 jeanswear products bearing the Infringing Designs, Defendants are deceptively  
12 attempting to "pass off" their products as those of RCRV, or as somehow related to or  
13 associated with, or sponsored or endorsed by, RCRV, thereby exploiting RCRV's  
14 reputation and goodwill in the marketplace.

15 45. Defendants' acts and conduct are likely to cause confusion, mistake and  
16 deception among the general consuming public and the trade as to the source of  
17 Defendants' products bearing the Infringing Designs, or as to a possible affiliation,  
18 connection or association between RCRV and Defendants, and/or between RCRV  
19 and Defendants' products bearing the Infringing Designs, in violation of RCRV's  
20 rights under the common law of the State of California.

21 46. Upon information and belief, by their actions, Defendants intend to  
22 continue their infringing and unfairly competitive acts, unless restrained by this  
23 Court.

24 47. Upon information and belief, by their willful acts, Defendants have  
25 made and will continue to make substantial profits and gains to which they are not in  
26 law or equity entitled.

27 48. Defendants' acts have damaged and, unless enjoined, will continue to  
28 irreparably damage RCRV, and RCRV has no adequate remedy at law.

1           49. Pursuant to the common law of the State of California, RCRV is entitled  
2 to injunctive relief and an award of damages and/or Defendants' profits resulting  
3 from their willful conduct.

4           50. RCRV is further informed and believes that Defendants' conduct was  
5 oppressive, fraudulent and malicious, and is thereby entitled to an award of punitive  
6 damages.

7                           **FOURTH CLAIM FOR RELIEF**  
8                           **CALIFORNIA UNFAIR COMPETITION**  
9                           **(Cal. Bus. & Prof. Code §§ 17200 *et seq.*)**

10           51. The allegations set forth in paragraphs 1 through 50 hereof are adopted  
11 and incorporated by reference as if fully set forth herein.

12           52. The aforesaid acts of Defendants constitute unlawful, unfair, or  
13 fraudulent unfair competition in violation of California Business & Professions Code  
14 §§ 17200 *et seq.*

15           53. Upon information and belief, RCRV has standing to assert this claim  
16 under California Business & Professions Code §§ 17200 *et seq.* because its monetary  
17 and property interests have been damaged by the aforesaid actions of Defendants. By  
18 way of example, upon information and belief, RCRV has lost sales of its jeanswear  
19 products due to Defendants' aforesaid conduct, and/or the value of RCRV's  
20 INVERTED FLEUR-DE-LIS DESIGN Trademark has been diminished by  
21 Defendants' actions.

22           54. Upon information and belief, by their actions, Defendants intend to  
23 continue their unfairly competitive conduct, unless restrained by this Court.

24           55. Upon information and belief, by their willful acts, Defendants have  
25 made and will continue to make substantial profits and gains to which they are not in  
26 law or equity entitled.

27           56. Defendants' acts have damaged and, unless enjoined, will continue to  
28 irreparably damage RCRV, and RCRV has no adequate remedy at law.

1           57. Pursuant to California Business & Professions Code §§ 17200 *et seq.*,  
2 RCRV is entitled to injunctive relief and an award of attorneys' fees and costs.

3                           **PRAYER FOR RELIEF**

4           WHEREFORE, RCRV demands judgment against Defendants as follows:

5           1. Finding that, (i) as to Count 1, Defendants engaged in willful trademark  
6 infringement of in violation of 15 U.S.C. § 1114; (ii) as to Count 2, Defendants  
7 engaged in willful false designation of origin and unfair competition in violation of  
8 15 U.S.C. § 1125(a); (iii) as to Count 3, Defendants engaged in willful trademark  
9 infringement and unfair competition under the common law of the State of California;  
10 and (iv) as to Count 4, Defendants engaged in willful unfair competition in violation  
11 of California Business & Professions Code §§ 17200 *et seq.*

12           2. That Defendants and all of those acting in concert with them, including  
13 their agents and servants, and all those on notice of this suit, be permanently enjoined  
14 from:

15                   (a) Designing, manufacturing, importing, exporting, distributing,  
16 supplying, advertising, promoting, offering for sale and/or selling any products which  
17 bear the Infringing Designs, or any other designs that are confusingly similar in  
18 appearance to RCRV's INVERTED FLEUR-DE-LIS DESIGN Trademark, and  
19 engaging in any other activity constituting an infringement of any of RCRV's rights  
20 in and to the INVERTED FLEUR-DE-LIS DESIGN Trademark; and

21                   (b) engaging in any activity constituting unfair competition with  
22 RCRV, or acts and practices that deceive the public and/or the trade, including,  
23 without limitation, the use of design elements and designations associated with  
24 RCRV.

25           3. That Defendants be required to take such other measures as the Court may  
26 deem appropriate to prevent the public from deriving any erroneous impression that  
27 products bearing the Infringing Designs have been designed, manufactured, imported,  
28 exported, distributed, supplied, advertised, promoted, offered for sale and/or sold by



1 RCRV, have been authorized by RCRV, or are related to or associated in any way  
2 with RCRV or its products.

3 4. That Defendants be required to recall all products bearing the Infringing  
4 Designs along with all advertising and promotional materials bearing images of such  
5 Infringing Designs, and thereafter to deliver up for destruction all Infringing Designs,  
6 artwork, packaging, advertising and promotional materials, and any means of making  
7 such items.

8 5. That Defendants be directed to file with the Court and serve upon RCRV,  
9 within thirty (30) days after service of a judgment or order upon Defendants, a  
10 written report under oath setting forth in detail the manner in which each Defendant  
11 has complied with the requirements set forth above in paragraphs 2 through 4 hereof.

12 6. That the Court award RCRV (i) Defendants' profits and RCRV's damages  
13 and/or statutory damages, attorneys' fees and costs, to the full extent provided for by  
14 15 U.S.C. § 1117, with any monetary award under 15 U.S.C. § 1117 to be trebled;  
15 (ii) attorneys' fees and injunctive and other equitable relief, to the full extent provided  
16 for by California Business & Professions Code §§ 17200 *et seq.*, to prevent  
17 Defendants from continuing to engage in the unlawful, unfair, and/or fraudulent  
18 business practices alleged herein and from continuing to receive ill-gotten gains  
19 therefrom; (iii) actual and punitive damages as provided under the common law of  
20 the State of California; and (iv) RCRV's attorneys' fees and litigation-related  
21 expenses incurred herein.

22 7. That RCRV be awarded pre-judgment and post-judgment interest on any  
23 monetary award made part of the judgment against Defendants.

24 8. That RCRV be awarded such additional and further relief as the Court  
25 deems just and proper.

1 Dated: October 11, 2013

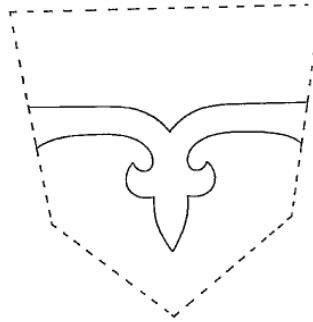
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**EXHIBIT A**

**United States of America**  
**United States Patent and Trademark Office**



**Reg. No. 4,248,371**

RCRV, INC. (CALIFORNIA CORPORATION)  
4715 S. ALAMEDA STREET  
LOS ANGELES, CA 90058

**Registered Nov. 27, 2012**

**Int. Cl.: 25**

FOR: APPAREL, NAMELY, JEANS, SHORTS AND SKIRTS, IN CLASS 25 (U.S. CLS. 22 AND 39).

**TRADEMARK**

FIRST USE 11-23-2005; IN COMMERCE 3-17-2006.

**PRINCIPAL REGISTER**

THE MARK CONSISTS OF A THREE-DIMENSIONAL DESIGN FEATURE CONSISTING OF A STYLIZED INVERTED FLEUR DE LIS DESIGN STITCHED ON THE BACK POCKET OF A JEANS PRODUCT, DEPICTED IN THE DRAWING AS A SOLID BLACK LINE. THE DOTTED OUTLINE OF THE GOODS IS INTENDED TO SHOW THE POSITION OF THE MARK AND IS NOT PART OF THE MARK AS SHOWN.

SEC. 2(F).

SER. NO. 85-330,951, FILED 5-26-2011.

MARK SPARACINO, EXAMINING ATTORNEY



*David J. Kyffas*

Director of the United States Patent and Trademark Office



Ex. A  
17



**EXHIBIT B**







Ex. B  
19





















